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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Rodger Williams et al.   Examiner: Shapiro, Jeffery A.

Serial No. 09/840,469   Art Unit: 3653

Filed: 04/23/2001

For: **MULTIPLE BROWSER INTERFACE**

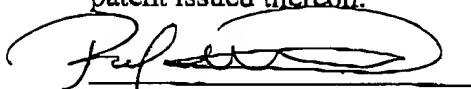Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

DECLARATION OF RODGER WILLIAMS

1.   My name is Rodger Williams. I am an employee of Gilbarco Inc., and have been for five years. Before my employment by Gilbarco Inc., I worked at Schlumberger Technologies, Inc. in their Retail Petroleum Systems (RPS) division which manufactured and sold retail fuel dispensers.

2.   I hold a Bachelor of Science degree in Computer Engineering from Old Dominion University and have worked as an engineer in the Retail Fuel Dispensing Industry for over 10 years.

3.   I am a co-inventor for the United States Patent Application identified above.

4.   I have reviewed U.S. Patent 6,442,448 to Finley and the IEEE document entitled "Frame Extensions for Virtual Bridged Local Area Network (VLAN) Tagging on 802.3 Networks."

5.   I am familiar with the browser enabled kiosks that have been deployed by Radiant Systems, Inc. and are disclosed in the '448 patent. Radiant Systems is the owner of the '448 patent. In particular, during my work at Schlumberger, I was involved in Centurion Dispenser development. Radiant Systems modified the Centurion Dispenser by placing two displays on the Centurion, each being controlled by their own microprocessor based system employing the Windows CE operating system.

6.   The browser enabled kiosks that have been deployed by Radiant Systems, Inc. are based on a Windows CE operating system. Windows CE does not contemplate a multi-display environment. In fact, Windows CE specifically can not allow a single IP address to serve multiple display devices. Therefore, as a function of this operating system, the Radiant Systems kiosks and those in the '448 patent have a unique IP address for each browser application running on the kiosk.

7.   By relying on Windows CE, fuel dispensers and kiosks employing the Radiant Systems technology disclosed in the '448 patent must provide each display with its own processor running Windows CE. This requirement highlights the improvement of the present invention. Whereas the Radiant system has dedicated hardware and an IP address for each display, the

present invention allows a single processor to use a single IP address and differentiate between browser applications on a single fuel dispenser through the associated ports.

8.   The use of a single processor and a single IP address for multiple displays on a fuel dispenser like that of the present invention allows the elimination of the additional processors, Ethernet devices and cabling, which lowers the cost of a kiosk employing the present invention relative to the cost of a kiosk employing the '448 technology. Furthermore, elimination of the additional processors eliminates components which may fail and/or require service.

9.   Radiant Systems has, to my knowledge, never been able to engineer a kiosk with multiple displays that has a single IP address and distinguishes between browser applications by using a unique port within the IP address. The failure to do so is, to the best of my knowledge, a result of the fact that the system of the '448 patent is designed to use a unique IP address for each browser application.

10.   While the IEEE reference does discuss the use of IP addresses, there is no disclosure in the IEEE document which suggests that different ports within the IP address may be used to distinguish between different browsers.

11.   Nothing in the '448 patent, or the deployed Radiant Systems kiosks suggests that different ports within the IP address may be used to distinguish between different browsers.

12.   I hereby declare that all declarations made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Rodger Williams   7/30/2003
                                                        Date

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